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February 28, 2015

REDACTED-FOR PUBLIC INSPECTION

VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Special Access Data Collection, WC Docket No. 05-25, RM-10593

Dear Secretary Dortch:

In response to the Federal Communications Commission's Special Access Data Collection, Telstra Incorporated ("Telstra"), by its attorneys, hereby submits its essay responses suitable for public inspection, including redacted versions of its confidential information. Pursuant to the Protective Order adopted in this proceeding¹, all pages of this filing are marked "REDACTED-FOR PUBLIC INSPECTION."

Versions of the essay responses containing Confidential information, as defined by the Protective Order, have been submitted via the Commission's Special Access Web Portal.

¹ *In the Matter of Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25; AT&T Corp. Petition for Rulemaking to Reform Regulations of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, WC Docket No. 05-25, RM-10593, Order and Data Collection Protective Order, 29 FCC Rcd 11657 (2014) ("Protective Order.")*.

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Marlene H. Dortch
February 28, 2015
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Any questions relating to the enclosed materials may be directed to Kate Coolican, Telstra, Legal Counsel, at (212) 863-2844 or to the undersigned at (202) 342-8614.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Denise N. Smith". The signature is fluid and cursive, with a large initial "D" and "S".

Denise N. Smith
Counsel to Telstra Incorporated

cc: Kate Coolican, Esq. (via e-mail)

Enclosure

Question II.A.5: Fiber Network Map. REDACTED – FOR PUBLIC INSPECTION

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QUESTION II.A.5. (NODES)

[illegible]

Question II.A.8. Explain your business rule(s) used to determine whether to build a *Connection* to a particular *Location*. Provide underlying assumptions.

- a. Describe the business rules and other factors that determine where you build your *Connections*. Examples of such rules/factors are minimum *Term Commitments* or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a *Connection* to an otherwise suitable *Location*. These could be factors that are under your control or those that are not.

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- b. Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.

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- c. In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy *Connections*, and where you generally have experienced or currently experience serious difficulties in deploying *Connections*, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

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TEL STRA GLOBAL - EVENTS FY2014		REDACTED – CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDERS IN WC DOCKET NO. 05-25 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION						
EVENT		Participation	Region	Speaking	Attending			
External Events								
Telstra Hosted Events								

TELSTRA GLOBAL - MASTER EVENTS LIST FY13/14
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EVENT	EVENT NAME	Participation	Region	Speaking	Attending	Owner

[illegible]

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Question II.A.18. If you offer *Dedicated Services* pursuant to an agreement or *Tariff* that contains either a *Prior Purchase-Based Commitment* or a *Non-Rate Benefit*, then explain how, if at all, those sales are distinguishable from similarly structured *ILEC* sales of *DS1s*, *DS3s*, and/or *PBDS*.

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Question II.A.19. Provide the business justification for the *Term* or *Volume Commitments* associated with any *Tariff* or agreement you offer or have in effect with a customer for the sale of *Dedicated Services*.

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QUESTION II.D.1.

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TELSTRA GLOBAL LEAD REPORT CAMPAIGN: LANGUAGE OF EXPANSION

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TELSTRA GLOBAL LEAD REPORT CAMPAIGN: LANGUAGE OF EXPANSION

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LANGUAGE OF EXPANSION CAMPAIGN BATTLECARD

A global campaign targeting IT decision makers from multi-national enterprises expanding to, from and within the Asia Pacific region.

FAST FACTS

CAMPAIGN SNAPSHOT

TARGET AUDIENCE

REASONS TO BELIEVE

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RELATED PRODUCTS

GLOBAL IPVPN



- 1000 access points in 45 countries and extensive reach in key Asian markets.
- Fully managed and highly-secured with dedicated in-country support.
- Simplified administration and reduced costs with extensive online reporting module.

CONNECTED COLO



- Global coverage providing access to 12 data centres in 6 countries.
- Robust facilities featuring ISO27001 accreditation and state-of-the art security features.
- Internationally connected with low latency access across Asia, EMEA and North America.

IP CONFERENCE



- Maximises IT investments, reduced telephony and travel expenses and improves workplace productivity.
- Dramatically reduce conference costs by up to 60%.

CAMPAIGN ASSETS

Supporting Material

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COMMISSION

LEAD FOLLOW-UP PROCESS

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SALES FOLLOW-UP CALL PROMPTS

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QUESTIONS?

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CAMPAIGN BRIEFING LANGUAGE OF EXPANSION

Todd Bates



Building a Telstra Global Campaign

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- Globally consistent
- Complements core TG value proposition
- Variety of tactics
- Run over a period of time
- Builds awareness
- Generates sales opportunities



Telstra Restricted

Campaign Objectives

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Telstra Restricted

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It's not just in the server room, it's in the boardroom. It's fundamental to the workings of your business and its objectives. This is particularly important when it comes to expanding into new markets such as Asia Pacific.

If your organisation is charting a course into new geographies, register now to receive **two exclusive reports from Telstra Global** and begin learning the language of expansion today.

BATTLECARD

ONLINE BANNERS

THE LANGUAGE OF EXPANSION

**THE LANGUAGE OF EXPANSION
CAMPAIGN BATTLECARD**

“You will find in the bottom row of the funnel, the 10 segments to focus on, the 10 segments to focus on, the 10 segments to focus on.”

CAMPAIGN OBJECTIVES

1. INCREASE AWARENESS OF TALENTA GLOBAL AS A BRAND
2. INCREASE AWARENESS OF TALENTA GLOBAL AS A BRAND
3. INCREASE AWARENESS OF TALENTA GLOBAL AS A BRAND
4. INCREASE AWARENESS OF TALENTA GLOBAL AS A BRAND
5. INCREASE AWARENESS OF TALENTA GLOBAL AS A BRAND
6. INCREASE AWARENESS OF TALENTA GLOBAL AS A BRAND
7. INCREASE AWARENESS OF TALENTA GLOBAL AS A BRAND
8. INCREASE AWARENESS OF TALENTA GLOBAL AS A BRAND
9. INCREASE AWARENESS OF TALENTA GLOBAL AS A BRAND
10. INCREASE AWARENESS OF TALENTA GLOBAL AS A BRAND

TARGET AUDIENCE

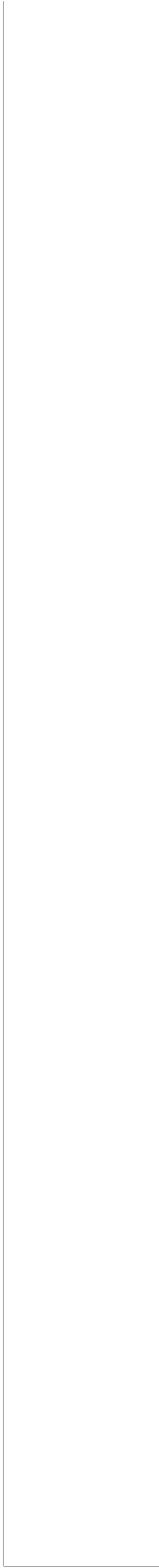
Segment	Target Audience	Key Characteristics
1	Executives in multinational corporations	Highly educated, high income, high status
2	Executives in multinational corporations	Highly educated, high income, high status
3	Executives in multinational corporations	Highly educated, high income, high status
4	Executives in multinational corporations	Highly educated, high income, high status
5	Executives in multinational corporations	Highly educated, high income, high status
6	Executives in multinational corporations	Highly educated, high income, high status
7	Executives in multinational corporations	Highly educated, high income, high status
8	Executives in multinational corporations	Highly educated, high income, high status
9	Executives in multinational corporations	Highly educated, high income, high status
10	Executives in multinational corporations	Highly educated, high income, high status

BATTLECARD

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INSPECTION**

Campaign ‘Applications’ & Assets

REDACTED - FOR PUBLIC INSPECTION



REDACTED - FOR PUBLIC INSPECTION

Campaign Reach

REDACTED - FOR PUBLIC INSPECTION

REDACTED - FOR PUBLIC INSPECTION

Campaign 'Flow'

REDACTED - FOR PUBLIC INSPECTION

REDACTED - FOR PUBLIC INSPECTION

TELSTRA RESTRICTED



Sales Involvement – What happens next?

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REDACTED - FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

Question II.F.11. For each year for the past five years, state the number of times and in what geographic area(s) you have switched from purchasing *End-User Channel Terminations* from one *Provider of Dedicated Services* to another.

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